

1 RUSS, AUGUST & KABAT  
2 Marc A. Fenster, SBN 181067  
3 Email: mfenster@raklaw.com  
4 Reza Mirzaie (CA SBN 246953)  
5 Email: rmirzaie@raklaw.com  
6 Brian D. Ledahl (CA SBN 186579)  
7 Email: bledahl@raklaw.com  
8 Paul Kroeger (CA SBN 229074)  
9 Email: pkroeger@raklaw.com  
10 C. Jay Chung (CA SBN 252794)  
11 Email: jchung@raklaw.com  
12 Philip X. Wang (CA SBN 262239)  
13 Email: pwang@raklaw.com  
14 12424 Wilshire Boulevard, 12<sup>th</sup> Floor  
15 Los Angeles, California 90025  
16 Telephone: (310) 826-7474  
17 Facsimile: (310) 826-6991

18 *Attorneys for Plaintiff*  
19 *Data Scape Limited*

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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

DATA SCAPE LIMITED,

Plaintiff,

v.

WESTERN DIGITAL CORPORATION,  
WESTERN DIGITAL  
TECHNOLOGIES, INC.,

Defendants.

Case No. 8:18-cv-02285-DOC-KES

**DECLARATION OF REZA  
MIRZAIE IN SUPPORT OF DATA  
SCAPE'S OPPOSITION TO  
DEFENDANTS' MOTION TO  
DISMISS**

1 I, Reza Mirzaie, declare and state as follows:

2 1. I am a member of the State Bar of California and a partner at the law  
3 firm Russ August & Kabat, counsel for Plaintiff Data Scape Limited in the above-  
4 captioned action. I have personal knowledge of the facts set forth in this declaration,  
5 and if called upon to testify, could and would testify competently under oath.

6 2. Attached as **Exhibit 1** is a true and correct copy of Data Scape's  
7 proposed First Amended Complaint.

8 3. Attached as **Exhibit 2** is a true and correct copy of the redlined version  
9 of Data Scape's proposed First Amended Complaint, showing differences between  
10 the original complaint and the First Amended Complaint.

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Executed June 10, 2019, at Los Angeles, California.

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14 /s/ Reza Mirzaie  
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